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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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In the Matter of

The Administration of the North  
American Numbering Plan

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) CC Docket No. 92-237  
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COMMENTS OF THE NATIONAL CABLE TELEVISION ASSOCIATION

The National Cable Television Association (NCTA), by its attorneys, submits the following "Comments" in the above-captioned proceeding.

NCTA is the principal trade association of the cable television industry. Its members provide cable television services to approximately 90 percent of the nation's 56 million cable television subscribers. NCTA members are undergoing an evolution in network design, which will allow for their networks to provide non-video services as a supplement to video offerings.

In considering long-range issues related to the administration of the North American Numbering Plan (NANP), as described in the Notice of Inquiry (NOI), the cable industry respectfully requests that the Commission consider the broad range of new services likely to be offered in the coming decade, like PCS, and consider what administration plan will be most conducive to facilitating the availability of these new services.

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## INTRODUCTION

The cable television industry is migrating from the traditional all-coaxial cable system design to a hybrid fiber and coaxial network design. In the hybrid fiber and coaxial system, fiber cables are provided from the central head end to fiber hubs.

Fiber is being introduced because it enables a substantial improvement in system performance and reliability, by significantly reducing the quantity of active components. This results in greatly increased downstream capacity. The additional capacity facilitates the provision of other services, such as pay-per-view, multi-media, alternative transport, and personal communication services. Thus, the cable industry has an interest in the issue of numbering plans and their administration.

### I. THE NANP POLICY SHOULD BE SET BY THE COMMISSION, IMPLEMENTED BY AN INDUSTRY ADVISORY COUNCIL AND ADMINISTERED BY BELLCORE

Phase one of the NOI focuses on who should administer the NANP and how the administration might be improved. The cable industry has not had direct experience with the previous administration of the NANP by Bellcore. But we are concerned about possible conflicts if Bellcore assigns numbers and determines dialing plans for new services that compete with Bellcore's owners, the Regional Bell Operating Companies, and their other local exchange carrier clients. These concerns are described in Paragraphs 25 and 26 of the NOI. In addition, NCTA is concerned that the NANP have sufficient flexibility to allow

new services to come into existence and have sufficient numbers available to be assigned to the new services to promote competition.

In the future, there might be a number of entities providing a variety of different local exchange services. In such an environment Bellcore, representing one segment of the market, should not unilaterally administer the NANP. Rather, NCTA proposes a three-tier management structure. At its highest level would be the FCC, which would set broad numbering and dialing policy. Below the FCC, an Advisory Council would implement the FCC policies and advise the FCC. Finally, Bellcore, as the North American Numbering Plan Administrator (NANPA), would execute the policies.

The advantage of this three-tier structure is that it ensures a neutral government agency is in charge of a national resource, analogous to the FCC's allocation of the electromagnetic spectrum. As stated above, the availability and structuring of numbers for new services is crucial to whether those new services can be provided. Given this importance, the FCC should set policy for the NANP.

The FCC's role in setting the broad numbering policy would involve the fair distribution of numbering resources; consideration of who is entitled to numbers and in what quantity; how future numbering plans should be structured; and what administrative guidelines should be followed by numbering administrators.

In implementing the FCC's policies, the Advisory Council would recommend the administrators of the subelements of the overall NANP (for example, local exchange, wireless, etc.), the range of codes to be allocated to various user classes, and the appropriate code utilization procedures to ensure code conservation. The advisory council should have representatives from all current and potential users, and should not be comprised in strict proportion to current numbering code utilization. Thus, local exchange carriers, interexchange carriers, competitive access providers, and the wireless industry, including PCS and cellular, should all be part of the advisory group. Members of the Council would be appointed by the FCC.

NANPA, in executing the policies, would assign actual code blocks, establish code conservation procedures, ensure that these procedures are executed by all parties, and monitor and report on utilization of numbers and the supply of unassigned numbers.

We believe that the above plan would provide for the most efficient and fair administration of the NANP. It would insure central oversight of the numbering resource by an impartial body, the FCC, while distributing administrative responsibilities to NANPA. It would retain the experience of Bellcore in administering the plan. These practices would apply to both geographic and non-geographic codes, ensuring that the entire NANP was managed fairly.

II. THE COMMISSION SHOULD ASSURE THE AVAILABILITY OF NUMBERING  
RESOURCES TO NEW SERVICES

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With respect to Phase Two of the NOI, NCTA generally believes that carrier identification codes, or CIC codes, ought to be readily available to new entrants. These codes are assigned to long distance carriers to facilitate their customers' access to such carriers, and as noted in paragraph 36 of the NOI, almost all available codes have been assigned.

Furthermore, given the new services which share local exchange business that are likely to be available, the Commission should take into account number portability. The cable industry believes that the Commission should apply the experience with 800 number portability to any proceeding it may conduct on portability of local numbers.

With respect to PCS and other new services, number portability as well as terminal equipment portability are important. The FCC, the Advisory Council, and the NANPA should take into account the value of early call identification to facilitate network efficiency (e.g., direct routing to current location) and various wireless/portable features. And, the FCC should ensure that adequate numbering resources are available to wireless/portable applications.

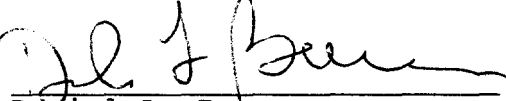
CONCLUSION

The administration of the NANP should be such that competition, especially with respect to new services, is fostered. Allowing NANP to be administered solely by Bellcore, without the benefit of the FCC's broad directions as to policy and an Advisory Council's oversight, is likely to hinder competition. The NCTA respectfully submits that its three-tiered administration scheme would benefit all numbering code users.

Respectfully submitted,

NATIONAL CABLE TELEVISION  
ASSOCIATION, INC.

By



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